

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

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U.S. DISTRICT COURT-WVND  
WHEELING, WV 26003

UNITED STATES OF AMERICA,

v.

CURTIS NEAL,  
KAREEM NEAL,  
BUKIYE HATTEN, and  
KADIR REEVES,

Defendants.

Criminal No. 1:21-cr-28 TSK/MJA

Violations: 18 U.S.C. § 2  
18 U.S.C. § 371  
18 U.S.C. § 922(a)(6)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(a)(2)  
21 U.S.C. § 841(a)(1)  
21 U.S.C. § 841(b)(1)(C)

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

(Conspiracy to Violate Federal Firearms Laws)

From in or about November 2019, until January 20, 2020, in or near Morgantown, Monongalia County, within the Northern District of West Virginia and elsewhere, defendants **CURTIS NEAL, KAREEM NEAL, BUKIYE HATTEN, and KADIR REEVES**, together and with other persons, did combine, conspire, confederate and agree to commit an offense against the United States, to wit, to knowingly make false written statements which are intended and likely to deceive a Federal Firearm Licensee regarding the lawfulness of the sale of firearms in connection with the acquisition of firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

MANNER AND MEANS

1. At all times relevant to this indictment, defendants **CURTIS NEAL**, and **KAREEM NEAL** were prohibited from possessing and purchasing firearms. **BUKIYE HATTEN**, who does not have a felony conviction prohibiting her from purchasing firearms, was recruited to purchase firearms for defendants from Federal Firearms Licensees (FFLs) at gun shows in Morgantown, West Virginia.
2. It was further a part of the scheme for defendants **CURTIS NEAL** and **KAREEM NEAL** to purchase firearms from private sellers at gun shows to avoid completing the ATF Form 4473 to purchase firearms.
3. Defendants **CURTIS NEAL** and **KADIR REEVES** transported the illegally obtained firearms to New Jersey.

OVERT ACTS

In furtherance of the conspiracy and to achieve the objects thereof, the defendants and others known and unknown to the Grand Jury, committed and caused to be committed the following overt act in the Northern District of West Virginia and elsewhere:

1. On November 16, 2019, in Morgantown, West Virginia, defendant **BUKIYE HATTEN**, unlawfully and falsely executed ATF Form 4473 to purchase ten firearms from a Federal Firearms Licensee (FFLs) for defendants **CURTIS NEAL** and **KADIR REEVES**.
2. On November 16, 2019, in Morgantown, West Virginia, defendant **BUKIYE HATTEN**, unlawfully and falsely executed ATF Form 4473 to purchase four firearms from a Federal Firearms Licensee (FFLs) for defendants **CURTIS NEAL** and **KADIR REEVES**.

And other OVERT ACTS all in violation of Title 18 United States Code, Section, 371.

**COUNT TWO**

(Aiding and Abetting the False Statement in Connection with the Acquisition of Firearms)

On or about November 16, 2019, in Monongalia County, in the Northern District of West Virginia, defendant **BUKIYE HATTEN**, aided and abetted by defendants **CURTIS NEAL** and **KADIR REEVES**, in connection with the attempted acquisition of firearms, that is a Taurus pistol, model G2C, 9mm caliber, serial number TLZ52807; a Taurus pistol, model G2S, 9mm caliber, serial number TLT16970; a Taurus pistol, G2S, 9mm caliber, serial number TMC14480; a Taurus pistol, model G2S, 9mm caliber, serial number TLT01526; a Taurus pistol, model G2S, 9mm caliber, serial number TLT01503; a Ruger pistol, model LC9, 9mm caliber, serial number 329-14088; Taurus pistol, model Spectrum, .380 caliber, serial number 1F140177; a Taurus pistol, model Spectrum, .380 caliber, serial number 1F121537; a Ruger pistol, model P944, .40 caliber, serial number 341-36121; and a Diamondback, pistol, model DB380, .380 caliber, serial number Zk6470; from a licensed dealer of firearms, did knowingly make a false written statement that was intended and likely to deceive such dealer with respect to a fact material to the lawfulness of the sale of such firearms, that is **BUKIYE HATTEN** falsely asserted in the Bureau of Alcohol, Tobacco, and Firearms, and Explosive form 4473, Firearms Transaction Record that she was the actual purchaser of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

**COUNT THREE**

(Aiding and Abetting the False Statement in Connection with the Acquisition of Firearms)

On or about November 16, 2019, in Monongalia County, in the Northern District of West Virginia, defendant **BUKIYE HATTEN**, aided and abetted by defendants **CURTIS NEAL**, and **KADIR REEVES**, in connection with the attempted acquisition of firearms, that is a Taurus revolver, model 856, .38 caliber, serial number LR84113; a Taurus revolver, model 856-SS, .38 caliber, serial number MS80177; a SCCY pistol, model CPX-1, 9mm caliber, serial number 770579; and a Rock Island/Armscc revolver, model 206, .38 caliber, serial number RIA1953749; from a licensed dealer of firearms, did knowingly make a false written statement that was intended and likely to deceive such dealer with respect to a fact material to the lawfulness of the sale of such firearms, that is **BUKIYE HATTEN** falsely asserted in the Bureau of Alcohol, Tobacco, and Firearms, and Explosive form 4473, Firearms Transaction Record that she was the actual purchaser of said firearms; in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

**COUNT FOUR**

(Possession with Intent to Distribute of Heroin)

On or about January 18, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **CURTIS NEAL**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FIVE**

(Possession with Intent to Distribute Cocaine Hydrochloride)

On or about January 18, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **CURTIS NEAL**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of cocaine hydrochloride, also known as “coke,” a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT SIX**

(Unlawful Possession of a Firearm)

On or about January 18, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **CURTIS NEAL**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that is Unlawful Possession of a Weapon and Robbery in the New Jersey Superior Court, Essex County, in case number 5-11-2662, and Possession of CDS, Possession of CDS with Intent, and Possession of CDS with Intent to Distribute within 1000 Feet in the New Jersey Superior Court, Hudson County, case number I-1121-6-99, knowingly possessed firearms, to wit, a Sturm, Ruger & Co., Inc. semi-automatic pistol, model LCP II, .380 caliber, serial number 380098541 and a Beemiller Inc. semi-automatic pistol (Hi-Point) model C9, 9mm caliber serial number 036029, said firearms were in and affecting commerce; in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 2.

**COUNT SEVEN**

(Unlawful Possession of a Firearm)

On or about January 18, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **KAREEM NEAL**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that is Possession of CDS with Intent within 1000 Feet of a School in the New Jersey Superior Court, Hudson County, case number 1232-7-00, and Possession of a Weapon in the New Jersey Superior Court, Hudson County, case number 1092-08-05, to wit, a Sturm, Ruger & Co., Inc. semi-automatic pistol, model LCP II, .380 caliber, serial number 380098541 and a Beemiller Inc. semi-automatic pistol (Hi-Point) model C9, 9mm caliber serial number 036029, said firearms were in and affecting commerce; in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 2.



**FORFEITURE ALLEGATION**

*Controlled Substance Act*

1. Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Sections 841 and 856, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including the following:

- Taurus pistol, model G2C, 9mm caliber, serial number TLZ52807;
- Taurus pistol, model G2S, 9mm caliber, serial number TLT16970;
- Taurus pistol, G2S, 9mm caliber, serial number TMC14480;
- Taurus pistol, model G2S, 9mm caliber, serial number TLT01526;
- Taurus pistol, model G2S, 9mm caliber, serial number TLT01503;
- Ruger pistol, model LC9, 9mm caliber, serial number 329-14088;
- Taurus pistol, model Spectrum, .380 caliber, serial number 1F140177;
- Taurus pistol, model Spectrum, .380 caliber, serial number 1F121537;
- Ruger pistol, model P944, .40 caliber, serial number 341-36121;
- Diamondback, pistol, model DB380, .380 caliber, serial number Zk6470;
- Taurus revolver, model 856, .38 caliber, serial number LR84113;
- Taurus revolver, model 856-SS, .38 caliber, serial number MS80177;
- SCCY pistol, model CPX-1, 9mm caliber, serial number 770579;
- Rock Island/Armscc revolver, model 206, .38 caliber, serial number RIA1953749;
- Sturm, Ruger & Co., Inc. semi-automatic pistol, model LCP II, .380 caliber, serial number 380098541; and

- a Beemiller Inc. semi-automatic pistol (Hi-Point) model C9, 9mm caliber serial number 036029.

2. Pursuant to Title 28, United States Code, Section 2461(c), the government will seek forfeiture of substitute property up to the value of property subject to direct forfeiture that is not available for forfeiture on account of any act or omission contemplated by Title 21, United States Code, Section 853(p)(1).

A true bill,

/s/

Grand Jury Foreperson

/s/

RANDOLPH J. BERNARD  
Acting United States Attorney

Zelda E. Wesley  
Assistant United States Attorney